



November 9, 2017

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St., SW, Room TW-A325
Washington, DC 20554

**Re: Bridging the Digital Divide for Low-Income Consumers, WC Docket No. 17-287
Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42
Telecommunications Carriers Eligible for Universal Service Support, WC
Docket No. 09-197**

Dear Ms. Dortch:

On November 8, 2017, Charles McKee and I of Sprint Corporation (“Sprint”) met separately with Jamie Susskind and Jay Schwarz to discuss the draft Lifeline Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry in the above-captioned dockets. In these meetings, Sprint stated its belief that non-facilities-based service providers do have a role to play in the Lifeline program, and expressed concern over the disruption that would occur for all program participants if non-facilities based carriers are no longer eligible to receive Lifeline support. Sprint urged the Commission to evaluate the impact the National Verifier will have on reducing waste, fraud and abuse before considering whether to radically change the Lifeline program by excluding non-facilities based carriers.

Sprint also opposed any flash cut elimination of the broadband port freeze rule. We explained that Sprint’s Assurance Wireless entity is able to provide a smartphone to its Lifeline broadband customers free of charge in large part because that end user would remain a customer for at least 12 months, and that a flash-cut elimination of the port freeze would result in significant stranded investment.

Finally, we explained why requiring a monthly payment from a Lifeline customer is not feasible for service providers such as Assurance Wireless that do not issue a monthly bill, and extremely problematic for low income Lifeline customers. However, to the extent that some customer payment is required, Sprint recommended that end user payment for a smartphone, or an annual end user payment, all should be considered “skin in the game.”

Pursuant to Section 1.1206 of the Commission’s Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

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Sincerely,

/s/ Norina T. Moy

Norina T. Moy
Director, Government Affairs

c: Jamie Susskind
 Jay Schwarz